

**BEFORE THE
MEDICAL BOARD OF CALIFORNIA
DEPARTMENT OF CONSUMER AFFAIRS
STATE OF CALIFORNIA**

In the Matter of the Accusation Against:

Case No. 02-2013-232020

VIOLETA MOYER DE JESUS, M.D., M.D.

**Physician's and Surgeon's
Certificate No. A48057**

Respondent

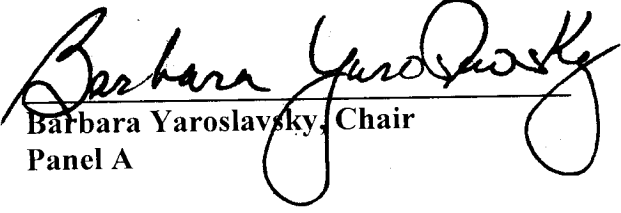
DECISION

The attached Stipulated Settlement and Disciplinary Order is hereby adopted as the Decision and Order of the Medical Board of California, Department of Consumer Affairs, State of California.

This Decision shall become effective at 5:00 p.m. on October 9, 2014.

IT IS SO ORDERED: September 9, 2014.

MEDICAL BOARD OF CALIFORNIA


Barbara Yaroslavsky, Chair
Panel A

1 KAMALA D. HARRIS
Attorney General of California
2 JOSE R. GUERRERO
Supervising Deputy Attorney General
3 JANNSEN TAN
Deputy Attorney General
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7 *Attorneys for Complainant*

8 **BEFORE THE**
MEDICAL BOARD OF CALIFORNIA
9 **DEPARTMENT OF CONSUMER AFFAIRS**
10 **STATE OF CALIFORNIA**

11 In the Matter of the Accusation Against:

Case No. 02-2013-232020

12 **VIOLETA M. DE JESUS, M.D.**

OAH No. 2014040505

13 325 S. Rosebud Ct.
14 Anaheim, CA 92808

**STIPULATED SETTLEMENT AND
DISCIPLINARY ORDER**

15 **Physician's and Surgeon's Certificate No.**
A48057

16 Respondent.

17
18 IT IS HEREBY STIPULATED AND AGREED by and between the parties to the above-
19 entitled proceedings that the following matters are true:

20 **PARTIES**

21 1. Kimberly Kirchmeyer ("Complainant") is the Executive Director of the Medical
22 Board of California. She brought this action solely in her official capacity and is represented in
23 this matter by Kamala D. Harris, Attorney General of the State of California, by Jannsen Tan,
24 Deputy Attorney General.

25 2. Respondent Violeta M. De Jesus, M.D. ("Respondent") is represented in this
26 proceeding by attorney Raymond J. McMahon, whose address is: 1851 East First Street, Suite
27 810 Santa Ana, CA 92705-404.
28

3. On or about March 19, 1990, the Medical Board of California issued Physician's and Surgeon's Certificate No. A48057 to Violeta M. De Jesus, M.D. (Respondent). On July 1, 2013, Respondent entered into a stipulation agreeing to the execution of an Interim Suspension Order, immediately suspending her certificate to practice medicine pending further order from the Office of Administrative Hearings. The Physician's and Surgeon's Certificate was in full force and effect at all times relevant to the charges brought in Accusation No. 02-2013-232020 and will expire on March 31, 2016, unless renewed.

JURISDICTION

4. Accusation No. 02-2013-232020 was filed before the Medical Board of California (Board) , Department of Consumer Affairs, and is currently pending against Respondent. The Accusation and all other statutorily required documents were properly served on Respondent on April 4, 2014. Respondent timely filed her Notice of Defense contesting the Accusation.

5. A copy of Accusation No. 02-2013-232020 is attached as exhibit A and incorporated herein by reference.

ADVISEMENT AND WAIVERS

6. Respondent has carefully read, fully discussed with counsel, and fully understands the charges and allegations in Accusation No. 02-2013-232020. Respondent has also carefully read, fully discussed with counsel, and fully understands the effects of this Stipulated Settlement and Disciplinary Order.

7. Respondent is fully aware of her legal rights in this matter, including the right to a hearing on the charges and allegations in Accusation No. 02-2013-232020; the right to be represented by counsel at her own expense; the right to confront and cross-examine the witnesses against her; the right to present evidence and to testify on her own behalf; the right to the issuance of subpoenas to compel the attendance of witnesses and the production of documents; the right to reconsideration and court review of an adverse decision; and all other rights accorded by the California Administrative Procedure Act and other applicable laws.

8. Having the benefit of counsel, Respondent voluntarily, knowingly, and intelligently waives and gives up each and every right set forth above.

1 **CULPABILITY**

2 9. Respondent admits the truth of paragraph six of Accusation No. 02-2013-232020.

3 10. Respondent does not contest that, at an administrative hearing, complainant could
4 establish a *prima facie* case with respect to the charges and allegations contained in Accusation
5 No. 02-2013-232020 and that she has thereby subjected her license to disciplinary action.

6 11. Respondent agrees that if he ever petitions for early termination or modification of
7 probation, or if the Board ever petitions for revocation of probation, all of the charges and
8 allegations contained in Accusation No. 02-2013-232020 shall be deemed true, correct and fully
9 admitted by Respondent for purposes of that proceeding or any other licensing proceeding
10 involving Respondent in the State of California

11 12. Respondent agrees that her Physician's and Surgeon's Certificate is subject to
12 discipline and she agrees to be bound by the Board's probationary terms as set forth in the
13 Disciplinary Order below.

14 **RESERVATION**

15 13. The admissions made by Respondent herein are only for the purposes of this
16 proceeding, or any other proceedings in which the Medical Board of California or other
17 professional licensing agency is involved, and shall not be admissible in any other criminal or
18 civil proceeding.

19 **CONTINGENCY**

20 14. The parties agree that this Stipulated Settlement and Disciplinary Order shall be
21 submitted to the Board for its consideration in the above-entitled matter and, further, that the
22 Board shall have a reasonable period of time in which to consider and act on this Stipulated
23 Settlement and Disciplinary Order after receiving it. By signing this stipulation, Respondent fully
24 understands and agrees that she may not withdraw her agreement or seek to rescind this
25 stipulation prior to the time that the Board considers and acts upon it.

26 12. The parties agree that this Stipulated Settlement and Disciplinary Order shall be
27 null and void and not binding upon the parties unless approved and adopted by the Board, except
28 for this paragraph, which shall remain in full force and effect. Respondent fully understands and

1 agrees that in deciding whether or not to approve and adopt this Stipulated Settlement and
2 Disciplinary Order, the Board may receive oral and written communications from its staff and/or
3 the Attorney General's office. Communications pursuant to this paragraph shall not disqualify the
4 Board, any member thereof, and/or any other person from future participation in this or any other
5 matter affecting or involving Respondent. In the event that the Board, in its discretion, does not
6 approve and adopt this Stipulated Settlement and Disciplinary Order, with the exception of this
7 paragraph, it shall not become effective, shall be of no evidentiary value whatsoever, and shall
8 not be relied upon or introduced in any disciplinary action by either party hereto. Respondent
9 further agrees that should the Board reject this Stipulated Settlement and Disciplinary Order for
10 any reason, Respondent will assert no claim that the Board, or any member thereof, was
11 prejudiced by its/his/her review, discussion and/or consideration of this Stipulated Settlement and
12 Disciplinary Order or of any matter or matters related hereto.

13 **ADDITIONAL PROVISIONS**

14 13. This Stipulated Settlement and Disciplinary Order is intended by the parties herein
15 to be an integrated writing representing the complete, final and exclusive embodiment of the
16 agreements of the parties in the above-entitled matter.

17 14. The parties agree that copies of this Stipulated Settlement and Disciplinary Order,
18 including copies of the signatures of the parties, may be used in lieu of original documents and
19 signatures and, further, that such copies shall have the same force and effect as originals.

20 15. In consideration of the foregoing admissions and stipulations, the parties agree the
21 Board may, without further notice to or opportunity to be heard by Respondent, issue and enter
22 the following Disciplinary Order:

23 **DISCIPLINARY ORDER**

24 IT IS HEREBY ORDERED that Physician's and Surgeon's Certificate No. A48057 issued
25 to Respondent Violeta M. De Jesus, M.D. (Respondent) is revoked. However, the revocation is
26 stayed and Respondent is placed on probation for five (5) years on the following terms and
27 conditions.

28 ///

1 1. PSYCHIATRIC EVALUATION. Within 30 calendar days of the effective date of
2 this Decision, and on whatever periodic basis thereafter may be required by the Board or its
3 designee, Respondent shall undergo and complete a psychiatric evaluation (and psychological
4 testing, if deemed necessary) by a Board-appointed board certified psychiatrist, who shall
5 consider any information provided by the Board or designee and any other information the
6 psychiatrist deems relevant, and shall furnish a written evaluation report to the Board or its
7 designee. Psychiatric evaluations conducted prior to the effective date of the Decision shall not
8 be accepted towards the fulfillment of this requirement. Respondent shall pay the cost of all
9 psychiatric evaluations and psychological testing.

10 Respondent shall comply with all restrictions or conditions recommended by the evaluating
11 psychiatrist within 15 calendar days after being notified by the Board or its designee.

12 Respondent shall not engage in the practice of medicine until notified by the Board or its
13 designee that Respondent is mentally fit to practice medicine safely. The period of time that
14 Respondent is not practicing medicine shall not be counted toward completion of the term of
15 probation.

16 2. PSYCHOTHERAPY. Within 60 calendar days of the effective date of this Decision,
17 Respondent shall submit to the Board or its designee for prior approval the name and
18 qualifications of a California-licensed board certified psychiatrist or a licensed psychologist who
19 has a doctoral degree in psychology and at least five years of postgraduate experience in the
20 diagnosis and treatment of emotional and mental disorders. Upon approval, Respondent shall
21 undergo and continue psychotherapy treatment, including any modifications to the frequency of
22 psychotherapy, until the Board or its designee deems that no further psychotherapy is necessary.

23 The psychotherapist shall consider any information provided by the Board or its designee
24 and any other information the psychotherapist deems relevant and shall furnish a written
25 evaluation report to the Board or its designee. Respondent shall cooperate in providing the
26 psychotherapist any information and documents that the psychotherapist may deem pertinent.

27 Respondent shall have the treating psychotherapist submit quarterly status reports to the
28 Board or its designee. The Board or its designee may require Respondent to undergo psychiatric

1 evaluations by a Board-appointed board certified psychiatrist. If, prior to the completion of
2 probation, Respondent is found to be mentally unfit to resume the practice of medicine without
3 restrictions, the Board shall retain continuing jurisdiction over Respondent's license and the
4 period of probation shall be extended until the Board determines that Respondent is mentally fit
5 to resume the practice of medicine without restrictions.

6 Respondent shall pay the cost of all psychotherapy and psychiatric evaluations.

7 3. MONITORING - PRACTICE. Within 30 calendar days of the effective date of this
8 Decision, Respondent shall submit to the Board or its designee for prior approval as a practice
9 monitor(s), the name and qualifications of one or more licensed physicians and surgeons whose
10 licenses are valid and in good standing, and who are preferably American Board of Medical
11 Specialties (ABMS) certified. A monitor shall have no prior or current business or personal
12 relationship with Respondent, or other relationship that could reasonably be expected to
13 compromise the ability of the monitor to render fair and unbiased reports to the Board, including
14 but not limited to any form of bartering, shall be in Respondent's field of practice, and must agree
15 to serve as Respondent's monitor. Respondent shall pay all monitoring costs.

16 The Board or its designee shall provide the approved monitor with copies of the Decision(s)
17 and Accusation(s), and a proposed monitoring plan. Within 15 calendar days of receipt of the
18 Decision(s), Accusation(s), and proposed monitoring plan, the monitor shall submit a signed
19 statement that the monitor has read the Decision(s) and Accusation(s), fully understands the role
20 of a monitor, and agrees or disagrees with the proposed monitoring plan. If the monitor disagrees
21 with the proposed monitoring plan, the monitor shall submit a revised monitoring plan with the
22 signed statement for approval by the Board or its designee.

23 Within 60 calendar days of the effective date of this Decision, and continuing throughout
24 probation, Respondent's practice shall be monitored by the approved monitor. Respondent shall
25 make all records available for immediate inspection and copying on the premises by the monitor
26 at all times during business hours and shall retain the records for the entire term of probation.

27 If Respondent fails to obtain approval of a monitor within 60 calendar days of the effective
28 date of this Decision, Respondent shall receive a notification from the Board or its designee to

1 cease the practice of medicine within three (3) calendar days after being so notified. Respondent
2 shall cease the practice of medicine until a monitor is approved to provide monitoring
3 responsibility.

4 The monitor(s) shall submit a quarterly written report to the Board or its designee which
5 includes an evaluation of Respondent's performance, indicating whether Respondent's practices
6 are within the standards of practice of medicine, and whether Respondent is practicing medicine
7 safely. It shall be the sole responsibility of Respondent to ensure that the monitor submits the
8 quarterly written reports to the Board or its designee within 10 calendar days after the end of the
9 preceding quarter.

10 If the monitor resigns or is no longer available, Respondent shall, within 5 calendar days of
11 such resignation or unavailability, submit to the Board or its designee, for prior approval, the
12 name and qualifications of a replacement monitor who will be assuming that responsibility within
13 15 calendar days. If Respondent fails to obtain approval of a replacement monitor within 60
14 calendar days of the resignation or unavailability of the monitor, Respondent shall receive a
15 notification from the Board or its designee to cease the practice of medicine within three (3)
16 calendar days after being so notified Respondent shall cease the practice of medicine until a
17 replacement monitor is approved and assumes monitoring responsibility.

18 In lieu of a monitor, Respondent may participate in a professional enhancement program
19 equivalent to the one offered by the Physician Assessment and Clinical Education Program at the
20 University of California, San Diego School of Medicine, that includes, at minimum, quarterly
21 chart review, semi-annual practice assessment, and semi-annual review of professional growth
22 and education. Respondent shall participate in the professional enhancement program at
23 Respondent's expense during the term of probation.

24 4. SOLO PRACTICE PROHIBITION. Respondent is prohibited from engaging in the
25 solo practice of medicine. Prohibited solo practice includes, but is not limited to, a practice
26 where: 1) Respondent merely shares office space with another physician but is not affiliated for
27 purposes of providing patient care, or 2) Respondent is the sole physician practitioner at that
28 location.

1 If Respondent fails to establish a practice with another physician or secure employment in
2 an appropriate practice setting within 60 calendar days of the effective date of this Decision,
3 Respondent shall receive a notification from the Board or its designee to cease the practice of
4 medicine within three (3) calendar days after being so notified. The Respondent shall not resume
5 practice until an appropriate practice setting is established.

6 If, during the course of the probation, the Respondent's practice setting changes and the
7 Respondent is no longer practicing in a setting in compliance with this Decision, the Respondent
8 shall notify the Board or its designee within 5 calendar days of the practice setting change. If
9 Respondent fails to establish a practice with another physician or secure employment in an
10 appropriate practice setting within 60 calendar days of the practice setting change, Respondent
11 shall receive a notification from the Board or its designee to cease the practice of medicine within
12 three (3) calendar days after being so notified. The Respondent shall not resume practice until an
13 appropriate practice setting is established.

14 5. NOTIFICATION. Within seven (7) days of the effective date of this Decision, the
15 Respondent shall provide a true copy of this Decision and Accusation to the Chief of Staff or the
16 Chief Executive Officer at every hospital where privileges or membership are extended to
17 Respondent, at any other facility where Respondent engages in the practice of medicine,
18 including all physician and locum tenens registries or other similar agencies, and to the Chief
19 Executive Officer at every insurance carrier which extends malpractice insurance coverage to
20 Respondent. Respondent shall submit proof of compliance to the Board or its designee within 15
21 calendar days.

22 This condition shall apply to any change(s) in hospitals, other facilities or insurance carrier.

23 6. SUPERVISION OF PHYSICIAN ASSISTANTS. During probation, Respondent is
24 prohibited from supervising physician assistants.

25 7. OBEY ALL LAWS. Respondent shall obey all federal, state and local laws, all rules
26 governing the practice of medicine in California and remain in full compliance with any court
27 ordered criminal probation, payments, and other orders.

28 8. QUARTERLY DECLARATIONS. Respondent shall submit quarterly declarations

1 under penalty of perjury on forms provided by the Board, stating whether there has been
2 compliance with all the conditions of probation.

3 Respondent shall submit quarterly declarations not later than 10 calendar days after the end
4 of the preceding quarter.

5 9. GENERAL PROBATION REQUIREMENTS.

6 Compliance with Probation Unit

7 Respondent shall comply with the Board's probation unit and all terms and conditions of
8 this Decision.

9 Address Changes

10 Respondent shall, at all times, keep the Board informed of Respondent's business and
11 residence addresses, email address (if available), and telephone number. Changes of such
12 addresses shall be immediately communicated in writing to the Board or its designee. Under no
13 circumstances shall a post office box serve as an address of record, except as allowed by Business
14 and Professions Code section 2021(b).

15 Place of Practice

16 Respondent shall not engage in the practice of medicine in Respondent's or patient's place
17 of residence, unless the patient resides in a skilled nursing facility or other similar licensed
18 facility.

19 License Renewal

20 Respondent shall maintain a current and renewed California physician's and surgeon's
21 license.

22 Travel or Residence Outside California

23 Respondent shall immediately inform the Board or its designee, in writing, of travel to any
24 areas outside the jurisdiction of California which lasts, or is contemplated to last, more than thirty
25 (30) calendar days.

26 In the event Respondent should leave the State of California to reside or to practice
27 Respondent shall notify the Board or its designee in writing 30 calendar days prior to the dates of
28 departure and return.

1 10. INTERVIEW WITH THE BOARD OR ITS DESIGNEE. Respondent shall be
2 available in person upon request for interviews either at Respondent's place of business or at the
3 probation unit office, with or without prior notice throughout the term of probation.

4 11. NON-PRACTICE WHILE ON PROBATION. Respondent shall notify the Board or
5 its designee in writing within 15 calendar days of any periods of non-practice lasting more than
6 30 calendar days and within 15 calendar days of Respondent's return to practice. Non-practice is
7 defined as any period of time Respondent is not practicing medicine in California as defined in
8 Business and Professions Code sections 2051 and 2052 for at least 40 hours in a calendar month
9 in direct patient care, clinical activity or teaching, or other activity as approved by the Board. All
10 time spent in an intensive training program which has been approved by the Board or its designee
11 shall not be considered non-practice. Practicing medicine in another state of the United States or
12 Federal jurisdiction while on probation with the medical licensing authority of that state or
13 jurisdiction shall not be considered non-practice. A Board-ordered suspension of practice shall
14 not be considered as a period of non-practice.

15 In the event Respondent's period of non-practice while on probation exceeds 18 calendar
16 months, Respondent shall successfully complete a clinical training program that meets the criteria
17 of Condition 18 of the current version of the Board's "Manual of Model Disciplinary Orders and
18 Disciplinary Guidelines" prior to resuming the practice of medicine.

19 Respondent's period of non-practice while on probation shall not exceed two (2) years.

20 Periods of non-practice will not apply to the reduction of the probationary term.

21 Periods of non-practice will relieve Respondent of the responsibility to comply with the
22 probationary terms and conditions with the exception of this condition and the following terms
23 and conditions of probation: Obey All Laws; and General Probation Requirements.

24 12. COMPLETION OF PROBATION. Respondent shall comply with all financial
25 obligations (e.g., restitution, probation costs) not later than 120 calendar days prior to the
26 completion of probation. Upon successful completion of probation, Respondent's certificate shall
27 be fully restored.

28 13. VIOLATION OF PROBATION. Failure to fully comply with any term or condition

1 of probation is a violation of probation. If Respondent violates probation in any respect, the
2 Board, after giving Respondent notice and the opportunity to be heard, may revoke probation and
3 carry out the disciplinary order that was stayed. If an Accusation, or Petition to Revoke Probation,
4 or an Interim Suspension Order is filed against Respondent during probation, the Board shall have
5 continuing jurisdiction until the matter is final, and the period of probation shall be extended until
6 the matter is final.

7 14. LICENSE SURRENDER. Following the effective date of this Decision, if
8 Respondent ceases practicing due to retirement or health reasons or is otherwise unable to satisfy
9 the terms and conditions of probation, Respondent may request to surrender his or her license.
10 The Board reserves the right to evaluate Respondent's request and to exercise its discretion in
11 determining whether or not to grant the request, or to take any other action deemed appropriate
12 and reasonable under the circumstances. Upon formal acceptance of the surrender, Respondent
13 shall within 15 calendar days deliver Respondent's wallet and wall certificate to the Board or its
14 designee and Respondent shall no longer practice medicine. Respondent will no longer be subject
15 to the terms and conditions of probation. If Respondent re-applies for a medical license, the
16 application shall be treated as a petition for reinstatement of a revoked certificate.

17 15. PROBATION MONITORING COSTS. Respondent shall pay the costs associated
18 with probation monitoring each and every year of probation, as designated by the Board, which
19 may be adjusted on an annual basis. Such costs shall be payable to the Medical Board of
20 California and delivered to the Board or its designee no later than January 31 of each calendar
21 year.

22 ACCEPTANCE

23 I have carefully read the above Stipulated Settlement and Disciplinary Order and have fully
24 discussed it with my attorney, Raymond J. McMahon. I understand the stipulation and the effect
25 it will have on my Physician's and Surgeon's Certificate. I enter into this Stipulated Settlement
26 and Disciplinary Order voluntarily, knowingly, and intelligently, and agree to be bound by the
27 Decision and Order of the Medical Board of California.
28

1 DATED:

7/8/2014

Violeta M. De Jesus

VIOLETA M. DE JESUS, M.D.
Respondent

3 I have read and fully discussed with Respondent Violeta M. De Jesus, M.D. the terms and
4 conditions and other matters contained in the above Stipulated Settlement and Disciplinary Order.
5 I approve its form and content.

6 DATED:

July 8, 2014

Raymond J. McMahon
Attorney for Respondent

8 ENDORSEMENT

9 The foregoing Stipulated Settlement and Disciplinary Order is hereby respectfully
10 submitted for consideration by the Medical Board of California.

11 Dated:

7/8/2014

Respectfully submitted,

KAMALA D. HARRIS
Attorney General of California
JOSE R. GUERRERO
Supervising Deputy Attorney General

JANNSEN TAN
Deputy Attorney General
Attorneys for Complainant

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8 *Attorneys for Complainant*

9 **BEFORE THE**
10 **MEDICAL BOARD OF CALIFORNIA**
11 **DEPARTMENT OF CONSUMER AFFAIRS**
STATE OF CALIFORNIA

12 In the Matter of the Accusation Against:

Case No. 02-2013-232020

13 **VIOLETA M. DE JESUS, M.D.**

ACCUSATION

14 325 S. Rosebud Ct.
Anaheim, CA 92808

15 Physician's and Surgeon's Certificate No. A48057

16 Respondent.

17
18 Complainant alleges:

19 **PARTIES**

20 1. Kimberly Kirchmeyer (Complainant) brings this Accusation solely in her official
21 capacity as the Executive Director of the Medical Board of California, Department of Consumer
22 Affairs.

23 2. On or about March 19, 1990, the Medical Board of California issued Physician's and
24 Surgeon's Certificate Number A48057 to Violeta M. De Jesus, M.D. (Respondent). The
25 Physician's and Surgeon's Certificate was in full force and effect at all times relevant to the
26 charges brought herein and will expire on March 31, 2016, unless renewed. On or about July 1,
27 2013, Respondent entered into a Stipulation of the Parties Re Interim Order Of Suspension and
28 Order, wherein Respondent is immediately prohibited from practicing medicine pending further

FILED
STATE OF CALIFORNIA
MEDICAL BOARD OF CALIFORNIA
SACRAMENTO April 4 2014
SY Walter Lee **ANALYST**

1 order from the Office of Administrative Hearings. Respondent remains suspended from the
2 practice of medicine, as of the date of the filing of this Accusation.

3 JURISDICTION

4 3. This Accusation is brought before the Medical Board of California (Board),
5 Department of Consumer Affairs, under the authority of the following laws. All section
6 references are to the Business and Professions Code unless otherwise indicated.

7 4. Section 822 of the Code states:

8 "If a licensing agency determines that its licensee's ability to practice his or her
9 profession safely is impaired because the licensee is mentally ill, or physically ill affecting
10 competency, the licensing agency may take action by any one of the following methods:

11 "(a) Revoking the licensee's certificate or license.

12 "(b) Suspending the licensee's right to practice.

13 "(c) Placing the licensee on probation.

14 "(d) Taking such other action in relation to the licensee as the licensing agency in its
15 discretion deems proper.

16 "The licensing section shall not reinstate a revoked or suspended certificate or license until
17 it has received competent evidence of the absence or control of the condition which caused its
18 action and until it is satisfied that with due regard for the public health and safety the person's
19 right to practice his or her profession may be safely reinstated."

20 CAUSE FOR RESTRICTIONS

21 (Mental or Physical Illness Affecting Competency to Safely Practice Medicine)

22 5. Respondent's Physician's and Surgeon's Certificate No. A48057 is subject to action
23 under section 822 of the Code in that her ability to practice medicine safely is impaired because
24 she is mentally ill or physically ill affecting competency, as more particularly alleged hereinafter:

25 6. On or about May 1, 2013, Respondent presented to the Colusa Regional Medical
26 Center to begin work as a locum tenens physician. At that time, respondent's ability to practice

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1 medicine safely was impaired as a result of mental illness or physical illness affecting
2 competency. Respondent was deemed unfit to practice medicine and was not permitted to begin
3 work as a physician at Colusa Regional Medical Center.

4 7. On or about November 5, 2013, respondent was examined by J.H., M.D., who is
5 board certified in Psychiatry. After conducting an examination of Respondent, Dr. J.H.
6 determined that Respondent suffers from bipolar disorder with paranoid personality traits, poor
7 insight regarding her illness and no meaningful treatment.

8 **PRAYER**

9 WHEREFORE, Complainant requests that a hearing be held on the matters herein alleged,
10 and that following the hearing, the Medical Board of California issue a decision:

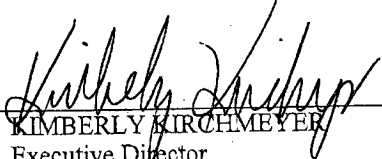
11 1. Revoking or suspending Physician's and Surgeon's Certificate Number A48057,
12 issued to Respondent Violeta M. De Jesus, M.D.;

13 2. Revoking, suspending or denying approval of Respondent Violeta M. De Jesus,
14 M.D.'s authority to supervise physician's assistants, pursuant to section 3527 of the Code;

15 2. If Respondent Violeta M. De Jesus, M.D., is placed on probation, ordering her to pay
16 the Medical Board of California the costs of probation monitoring; and

17 4 Taking such other and further action as deemed necessary and proper.

18
19 DATED: April 4, 2014


KIMBERLY KIRCHMEYER
Executive Director
Medical Board of California
Department of Consumer Affairs
State of California
Complainant

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